

FILED

August 21, 2024

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: RR Deputy

Case No: SA:24-CR-00412-XR

UNITED STATES OF AMERICA

Plaintiff

v

SINA CHOHLI SOBBY

a/k/a Loko Diez

Defendant

INDICTMENT

**COUNT 1: 18 U.S.C. §933
Firearm Trafficking**

**COUNT 2: 18 U.S.C. §922(o)
Possession of a Machine Gun**

**COUNT 3: 26 U.S.C. §5861(d)
Possession of Unregistered Machine Gun**

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 933]**

On or about the 30th day of April, 2024, in the Western District of Texas, the defendant,

SINA CHOHLI SOBBY, a/k/a “Loko Diez,”

did ship, transport, transfer, cause to be transported, or otherwise dispose of at least one firearm, to wit: a Century Arms, model RAS47, 7.62 caliber rifle, serial number RAS47044557, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, to wit: smuggling goods from the United States and possession of a machinegun, all in violation of Title 18, United States Code, Section 933(a)(1).

COUNT TWO
[18 U.S.C. § 922(o)]

On or about the 30th day of April, 2024, in the Western District of Texas, the defendant,

SINA CHOHLI SOBBY, a/k/a “Loko Diez,”

did knowingly possess at least one machinegun, that is, an M16-type, 5.56mm NATO firearm, serial number 1776-120402, and a Century Arms, model RAS47, 7.62 caliber rifle, serial number RAS47044557, which were capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT THREE
[26 U.S.C. §5861(d)]

On or about 30th day of April, 2024, in the Western District of Texas, the defendant,

SINA CHOHLI SOBBY, a/k/a “Loko Diez,”

knowingly possessed at least one firearm, to wit: an M16-type, 5.56mm NATO firearm, serial number 1776-120402, and a Century Arms, model RAS47, 7.62 caliber rifle, serial number RAS47044557, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

NOTICE OF UNITED STATES OF AMERICA’S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearm Violation and Forfeiture Statutes

[Title 18 U.S.C. § 933, subject to forfeiture pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B)]

As a result of the criminal violation set forth in Count One, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. Forfeiture and Fines.

(a) Forfeiture. --

(1) In general. -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

II.

Firearm Violation and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(o) and 933, subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Counts Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (o) . . . of section 922 . . . or 933 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

III.

Unregistered Possession Violation and Forfeiture Statutes

[Title 26 U.S.C. § 5861(d), subject to forfeiture pursuant to Title 26 U.S.C. § 5872, made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Count Three, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 26 U.S.C. § 5872, made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 26 U.S.C. § 5872. Forfeitures

(a) Laws applicable- Any firearm involved in any violation of the provisions of this chapter shall be subject to seizure and forfeiture. . .

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:

A handwritten signature in ink, appearing to read 'Z. Parsons'.

Zachary W. Parsons
Assistant U.S. Attorney